

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**JAMES ALLEN HUGHEY**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO: 3:18CV4-NBB-RP**

**TIPPAH COUNTY, MISSISSIPPI,  
TOMMY MASON, in His Individual Capacity,  
and "X" Bonding Company**

**DEFENDANTS**

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**PLAINTIFF'S PRE-DISCOVERY DISCLOSURE OF CORE INFORMATION**

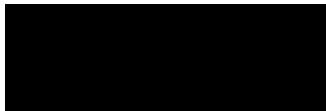
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**COMES NOW**, Plaintiff James Allen Hughey, by and through counsel, and submits this Pre-Discovery Disclosure of Core Information, in compliance with Uniform Local Rule 26(a)(1) and Fed. R. Civ. P. 26(a), as follows:

**A. PERSONS WITH KNOWLEDGE:**

Pursuant to Uniform Local Rule 26(a)(1) and Fed.R.Civ.P. 26(a)(1)(A)(i), Plaintiff provides the following names and, if known, the address and telephone number, of each individual likely to have discoverable information that Plaintiff may use to support his claims or defenses, identifying the subjects of the information:

1. Michelle Bennett



**KNOWLEDGE:** Bennett has knowledge of being with Plaintiff on the day of June 6, 2017, prior to the incident which occurred between Plaintiff and Defendant Mason. She also has knowledge of Plaintiff's acting confused and disoriented due to health problems, and that Plaintiff had not been drinking that day.

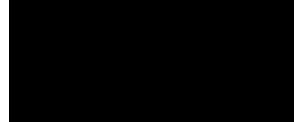


2. Maurice Effinger



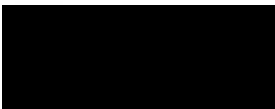
KNOWLEDGE: Effinger has knowledge of hearing conversations between Karen Hughey and Brenda Crumpton wherein Brenda Crumpton stated Plaintiff had done nothing wrong. He further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

3. Billy Alberson



KNOWLEDGE: Mr. Alberson has knowledge of driving by Brenda Crumpton's residence on June 6, 2017, and seeing Plaintiff lying face down on the ground with Defendant Mason standing over him. He also has knowledge of there being no police officers present at the time.

4. Gilberto Guerrero



KNOWLEDGE: Guerrero has knowledge of hearing conversations between Karen Hughey and Collene Brown Davis wherein Collene Brown Davis stated Defendant Mason had beaten Plaintiff, and that Plaintiff had done nothing wrong. He further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

5. Collene Brown Davis  
(Address Unknown)



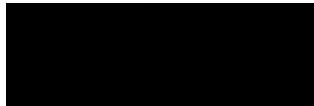
KNOWLEDGE: Davis has knowledge of calling Plaintiff's sister on June 6, 2017, to tell her Plaintiff had been taken to the hospital after being beaten by Defendant Mason. She also has knowledge of making statements that Plaintiff had done nothing wrong. She further has knowledge of telling Plaintiff's sister that Defendant Mason had beaten her sister when he was married to her.

6. Pete Hughey



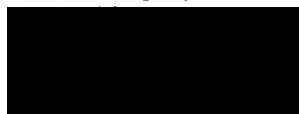
KNOWLEDGE: Pete Hughey has knowledge of Plaintiff's injuries. He further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

7. Linda Hughey



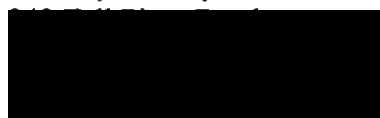
KNOWLEDGE: Linda Hughey has knowledge of Plaintiff's injuries. She further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

8. Karen Hughey



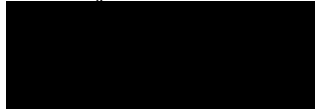
KNOWLEDGE: Karen Hughey has knowledge of Plaintiff's injuries. She further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

9. Dorothy Barkley



KNOWLEDGE: Ms. Barkley has knowledge of Plaintiff's background, character and damages.

10. Becky Creasie



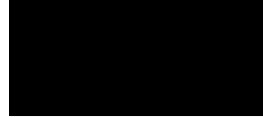
KNOWLEDGE: Ms. Creasie has knowledge of Plaintiff's background, character and damages.

11. Kevin Bennett



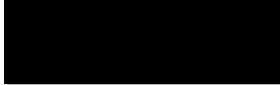
KNOWLEDGE: Mr. Bennett has knowledge Plaintiff's background, character and damages. r. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

12. Cathy Davis



KNOWLEDGE: Ms. Davis has knowledge of Plaintiff's personal and moral character.

13. Kyla Lumpkin



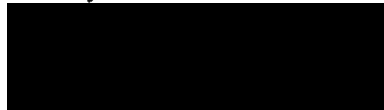
KNOWLEDGE: Ms. Lumpkin has knowledge of Plaintiff's personal and moral character.

14. Shane Nance



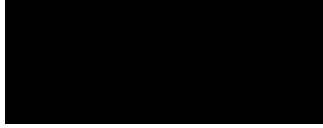
KNOWLEDGE: Mr. Nance has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

15. Jimmy Mercer



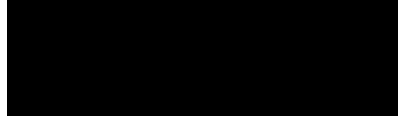
KNOWLEDGE: Mr. Mercer has knowledge of Plaintiff's personal and moral character.

16. Brittany Gross



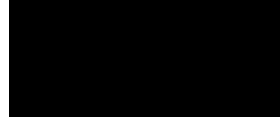
KNOWLEDGE: Ms. Gross has knowledge of Plaintiff's personal and moral character.

17. Mavis Hunt



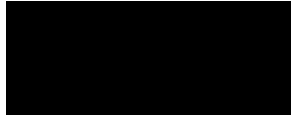
KNOWLEDGE: Ms. Hunt has knowledge of Plaintiff's personal and moral character.

18. Tim Slaton



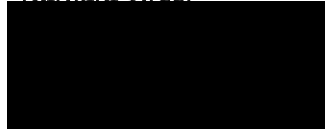
KNOWLEDGE: Mr. Slaton has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

19. Steven Stanford



KNOWLEDGE: Mr. Stanford has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

20. Barbara Greer



KNOWLEDGE: Ms. Greer has knowledge of Plaintiff's personal and moral character.

21. Tim Alberson



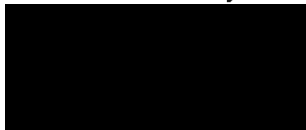
KNOWLEDGE: Mr. Alberson has knowledge of Plaintiff's personal and moral character.

22. Robyn McNabb



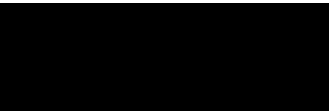
KNOWLEDGE: Ms. McNabb has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

23. Rebecca Anthony



KNOWLEDGE: Ms. Anthony has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

24. Chris Nutt



KNOWLEDGE: Mr. Nutt has knowledge of Plaintiff's personal and moral character.

25. Jay Kimery



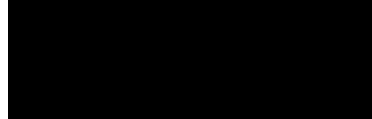
KNOWLEDGE: Mr. Kimery has knowledge of Plaintiff's personal and moral character.

26. Teresa Koon Waldon



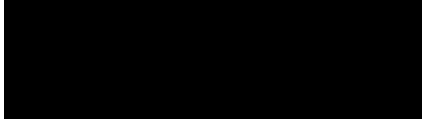
KNOWLEDGE: Ms. Waldon has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

27. Scott Feathers



KNOWLEDGE: Mr. Feathers has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

28. James Ripley



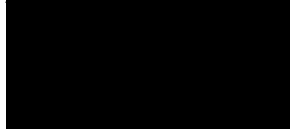
KNOWLEDGE: Mr. Ripley has knowledge of Plaintiff's personal and moral character.

29. James Hockman



KNOWLEDGE: Mr. Hockman has knowledge of Plaintiff's personal and moral character.

30. Jonathan Boler



KNOWLEDGE: Mr. Boler has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

31. Michelle Williams  
(Address Unknown)

KNOWLEDGE: Ms. Williams has knowledge of Plaintiff's personal and moral character.

32. Jeffrey Lumpkin
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KNOWLEDGE: Mr. Lumpkin has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

33. Brian Hudspeth, Jr.
- 

KNOWLEDGE: Mr. Hudspeth has knowledge of Plaintiff's personal and moral character.

34. Alanna Hardesty
- 

KNOWLEDGE: Ms. Hardesty has knowledge of Plaintiff's personal and moral character.

35. Courtney Hughey
- 

KNOWLEDGE: Ms. Hughey has knowledge of Plaintiff's personal and moral character. She also has knowledge of Plaintiff's injuries. She further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

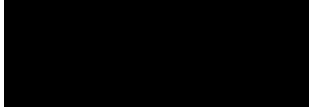


36. Kelly Gamblin



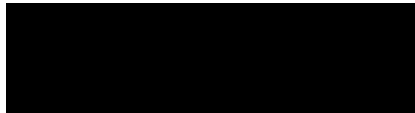
KNOWLEDGE: Ms. Gamblin has knowledge of Plaintiff's personal and moral character.

37. Lisa Madru



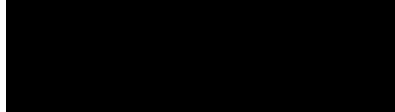
KNOWLEDGE: Ms. Madru has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

38. Kelley McCallum



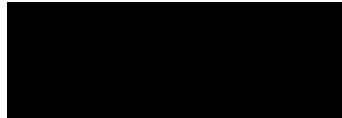
KNOWLEDGE: Ms. McCallum has knowledge of Plaintiff's personal and moral character.

39. James Houston



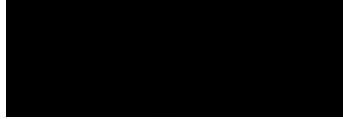
KNOWLEDGE: Mr. Houston has knowledge of Plaintiff's personal and moral character.

40. Brenda Nance



KNOWLEDGE: Ms. Nance has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

41. Larry Nance



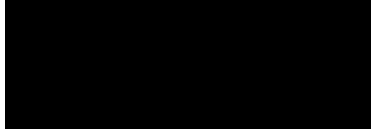
KNOWLEDGE: Mr. Nance has knowledge of Plaintiff's personal and moral character. He further has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

42. Brenda Pannell



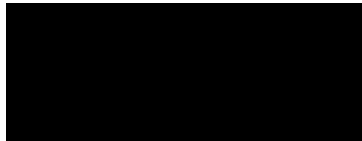
KNOWLEDGE: Mr. Pannell has knowledge of Plaintiff's personal and moral character.

43. Marion Autry



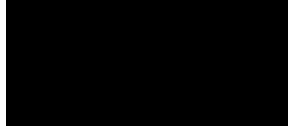
KNOWLEDGE: Ms. Autry has knowledge of Plaintiff's personal and moral character.

44. Shannon Henderson



KNOWLEDGE: Ms. Henderson has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

45. Annie Faye Smith



KNOWLEDGE: Ms. Smith has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

46. Angie Hardin



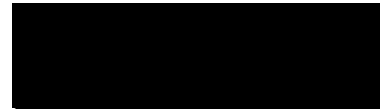
KNOWLEDGE: Ms. Hardin has knowledge of Plaintiff's personal and moral character.

47. Charlie Cannon



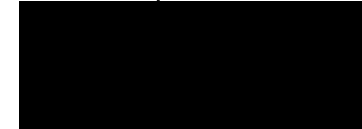
KNOWLEDGE: Mr. Cannon has knowledge of Plaintiff's personal and moral character.

48. Catina Bennett Isbell



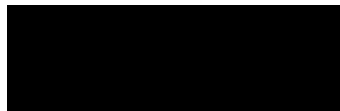
KNOWLEDGE: Ms. Isbell has knowledge of Plaintiff's personal and moral character.

49. Donna Hopkins



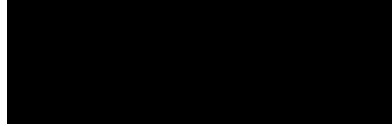
KNOWLEDGE: Ms. Hopkins has knowledge of Plaintiff's personal and moral character.

50. Glenn Collins



KNOWLEDGE: Mr. Collins has knowledge of Plaintiff's personal and moral character.

51. Linda Mannon



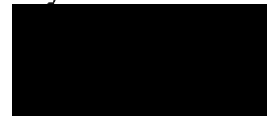
KNOWLEDGE: Ms. Mannon has knowledge of Plaintiff's personal and moral character.

52. Peggy Lumpkin



KNOWLEDGE: Ms. Lumpkin has knowledge of Plaintiff's personal and moral character.

53. Tyler Marcum



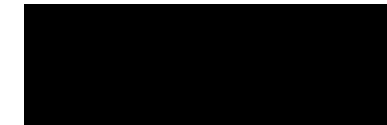
KNOWLEDGE: Mr. Marcum has knowledge of Plaintiff's personal and moral character.

54. Julie Hernandez



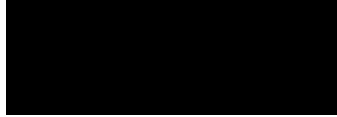
KNOWLEDGE: Ms. Hernandez has knowledge of Plaintiff's personal and moral character.

55. Amanda Mills



KNOWLEDGE: Ms. Mills has knowledge of Plaintiff's personal and moral character.

56. Stacy Britt



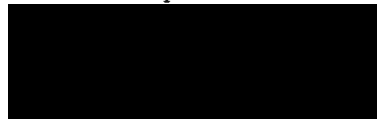
KNOWLEDGE: Ms. Britt has knowledge of Plaintiff's personal and moral character. She also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

57. Cynthia Shaw King



KNOWLEDGE: Ms. King has knowledge of Plaintiff's personal and moral character.

58. Kirsten Hopkins



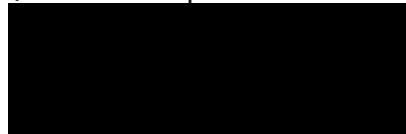
KNOWLEDGE: Ms. Hopkins has knowledge of Plaintiff's personal and moral character.

59. Jennifer Stephens



KNOWLEDGE: Ms. Stephens has knowledge of Plaintiff's personal and moral character.

60. Shaun Waldrop



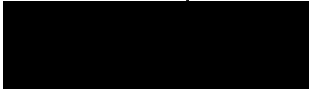
KNOWLEDGE: Mr. Waldrop has knowledge of Plaintiff's personal and moral character. He also has knowledge of the mental anxiety and stress suffered by Plaintiff as a direct result of the actions of Defendant Mason.

61. Chad Cummings



KNOWLEDGE: Mr. Cummings has knowledge of being the investigating agent.

62. Brenda Crumpton



KNOWLEDGE: Ms. Crumpton has knowledge of the incident which occurred at her residence on June 6, 2017 between Plaintiff and Defendant Mason. She also has knowledge of making the statement that she pulled up in her vehicle as Defendant Mason was beating Plaintiff and that she made Defendant Mason stop before he killed Plaintiff. She also has knowledge of making the statement that Plaintiff had done nothing wrong.

63. Amanda Mason  
(Address Unknown)

KNOWLEDGE: Ms. Mason has knowledge of the incident which occurred at her residence on June 6, 2017 between Plaintiff and Defendant Mason. She also has knowledge of Defendant Mason's having beaten her in the past, and her attempt to obtain law enforcement assistance from Defendant Tippah County.

64. Karl Gaillard  
Currently Employed by Defendant Tippah County

KNOWLEDGE: Mr. Gaillard has knowledge of failing to correct Defendant Mason for previous acts of assault, as well as failing to correct Defendant Mason for his steroid use. He also has knowledge of Tippah County Sheriff's Department's policies regarding the incarceration of injured individuals.

65. James Page  
(Address Unknown)

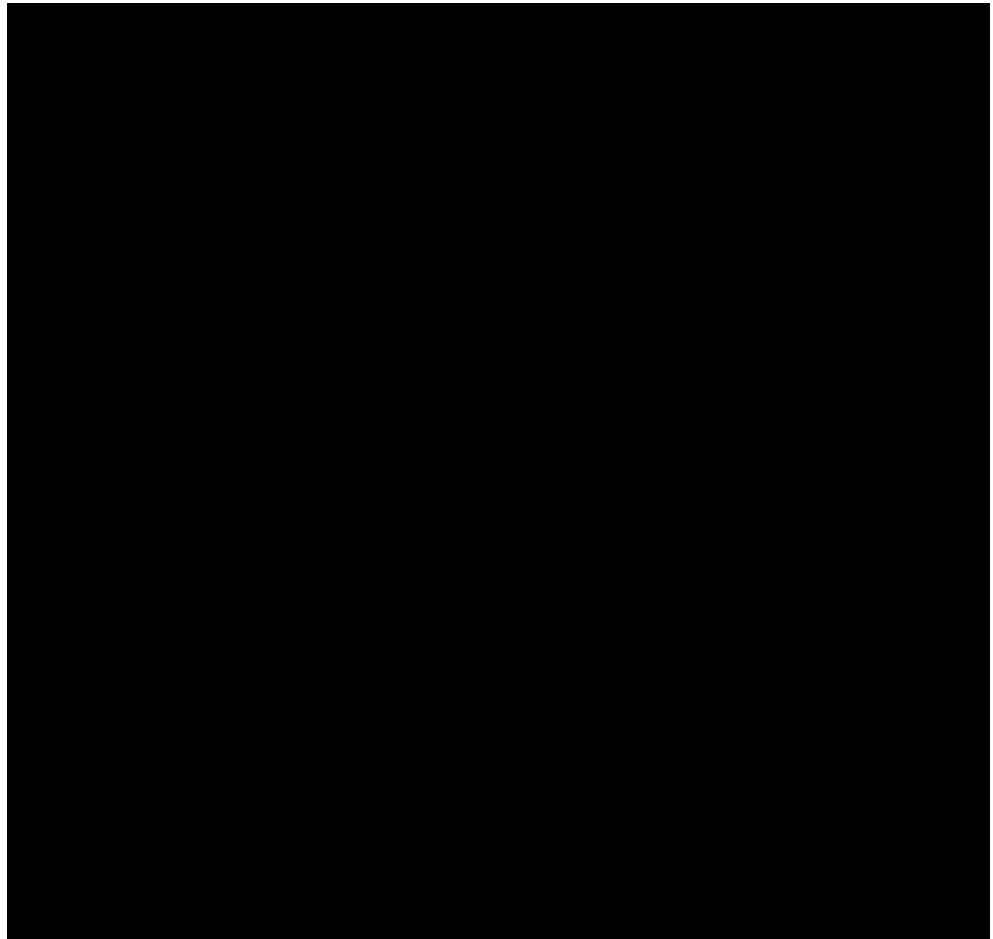
KNOWLEDGE: Mr. Page has knowledge of Tippah County Sheriff's Department's policies regarding the incarceration of injured individuals.

66. Any individual identified by any witness during depositions or by any of the parties in discovery responses or by the submission of affidavits.

**B. RELEVANT DOCUMENTS:**

Pursuant to Uniform Local Rule 26(a)(1) and Fed.R.Civ.P. 26(a)(1)(A)(ii), Plaintiff attaches hereto a copy of all documents, electronically stored information, and tangible things that Plaintiff has in his possession, custody, or control and may use to support his claims or defenses.

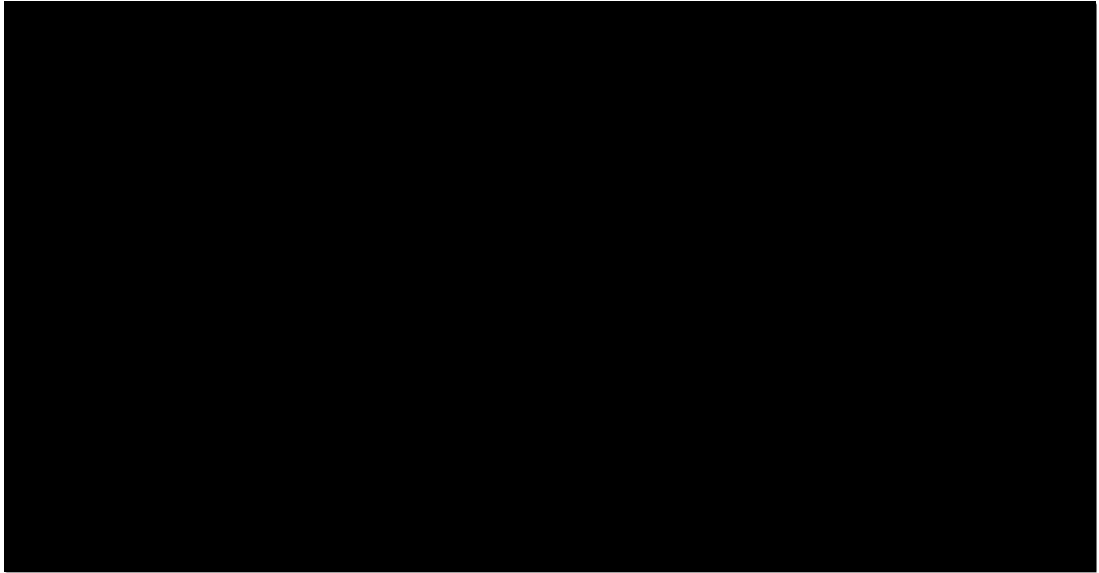
- 1.
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**C. DAMAGES:**

Pursuant to Uniform Local Rule 26(a)(1) and Fed.R.Civ.P. 26(a)(1)(A)(iii), Plaintiff provides the following computation of each category of damages to which he is entitled:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.



**D. Any insurance agreement under which any person may be liable to satisfy part or all of a judgment entered.**

Not applicable.

**RESPECTFULLY SUBMITTED**, this the 9th day of October, 2018.

**McLAUGHLIN LAW FIRM**

By: /s R. Shane McLaughlin  
R. Shane McLaughlin (Miss. Bar No. 101185)  
338 North Spring Street, Suite 2  
P.O. Box 200  
Tupelo, Mississippi 38802  
Telephone: (662) 840-5042  
Facsimile: (662) 840-5043  
E-mail: [rsm@mclaughlinlawfirm.com](mailto:rsm@mclaughlinlawfirm.com)

**ATTORNEY FOR PLAINTIFF**



**CERTIFICATE OF SERVICE**

I certify that I have this day served this document on the following persons by electronic mail as addressed as follows:

**Jim Waide  
Rachel Pierce Waide  
Waide & Associates, P.A.  
Post Office Box 1357  
Tupelo, Mississippi 38802  
waide@waidelaw.com**

**Daniel Griffith  
Arnold Luciano  
Jacks Griffith Luciano, P.A.  
Post Office Box 1209  
Cleveland, Mississippi 38732  
dgriffith@jlpalaw.com  
aluciano@jlpalaw.com**

**William Allen  
Katelyn Riley  
Allen, Allen, Breeland & Allen, PLLC  
Post Office Box 751  
Brookhaven, Mississippi 39602  
wallen@aabalegal.com  
kriley@aabalegal.com**

**THIS the 9th day of October, 2018.**

**/s R. Shane McLaughlin**